

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
NORTHERN DIVISION**

In the Matter of the Petition

of

GRACE OCEAN PRIVATE LIMITED, as  
Owner of the M/V DALI,

and

SYNERGY MARINE PTE LTD, as Manager  
of the M/V DALI,

for Exoneration from or Limitation of  
Liability

Civ. No. 24-00941-JKB

***IN ADMIRALTY***

**JOINT STATUS REPORT CONCERNING DEPOSITION LOGISTICS**

Petitioners and Claimants (hereinafter collectively the “Parties”), through undersigned counsel, submit this Joint Status Report in response to this Court’s Order dated April 16, 2025 (ECF No. 503).

**Deposition Location**

Heretofore, the Parties have disagreed on the location at which the Petitioners’ shore-based employees must appear for deposition. The disagreement has been the subject of extensive briefing and two court orders (ECF Nos. 489 and 500). However, following the suggestions of Judge Bredar (ECF No. 500 at 6) and Magistrate Judge Sullivan (ECF No. 503 at 1), the Parties have reached an agreement concerning the disputed witnesses. The agreement is set out in the table below:

Concerning the depositions of the individuals who were identified by name in the Claimants' motion:

<b>Witness</b>	<b>Location</b>	<b>Anticipated Timing</b>
Balaji V.	London	June
Capt. Ravi Sekhar BV	London	June
Vishal C. Prabhu	London	June
Capt. Melroy D'Souza	London	June
Rajesh Inigo K.	London	June
R. Karthik Nair	London	June

Concerning the depositions of the former crew members of the DALI who were expatriated from the United States after the allision:

<b>Witness</b>	<b>Location</b>	<b>Anticipated Timing</b>
Babu Alan	London	May/June
Madathilparambil Chandrasekharan, Shiju	London	May/June
Subramanian Selvakumar	London	September
Aviral Manihal	London	May/June
Mahesh Balaji Ankade	London	September
Maragasseri Rajan	London	July/August
Kumar Sunil	London	July/August
Dominic Peeris Dobus Peeris	London	Unknown
Venu Sivalingam	London	Unknown
Kashmiri Lal	London	May/June

Nadammal Shershad	London	May/June
Antony Goodwin <sup>1</sup>	Baltimore	May
Kumararaja Kuppuswamy <sup>2</sup>	Baltimore	May

Concerning the depositions of other Synergy shore-based personnel who have not been previously identified by name:<sup>3</sup>

<b>Witness</b>	<b>Location</b>	<b>Anticipated Timing</b>
Ajith Kumar	Baltimore <sup>4</sup>	June/July
Phillip Jason Lewis	London	June/July
Chetan Sharma	London	June/July
Singh Yadav	London	June/July
Jayesh Panayanthatta	London	June/July
Dhurai Balaji	London	Unknown
Ritika Choudhary	London	June/July
S. Angarayan	London	June/July
Yogananth Palanichamy	London	June/July

The Parties have further agreed that U.S.-based court reporters (associated with the same firm that has done the reporting for all depositions to date) will travel to London to record the

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<sup>1</sup> Mr. Goodwin was permitted to leave the country temporarily but is expected back in the United States within the next 30 days.

<sup>2</sup> Mr. Kuppuswamy was permitted to leave the country temporarily but is expected back in the United States within the next 30 days.

<sup>3</sup> Claimants reserve the right to identify additional witnesses to be deposed. The locations for those depositions will be determined on a case-by-case basis.

<sup>4</sup> This deposition will proceed in Baltimore unless otherwise agreed by the Parties.

depositions listed above (and any others), and that any objections to the court reporters' administration of the witness oath in a foreign jurisdiction are waived.

### **Scheduling**

The Parties have been working cooperatively on discovery. Nevertheless, the production of documents by Petitioners has been challenging given the volume of documents involved and related circumstances. Thus far, Petitioners have produced nearly 700,000 pages of documents. They anticipate substantially completing their document production by May 30.

To ensure that Claimants have a meaningful opportunity to receive and review all responsive documents prior to the conclusion of fact discovery, the Parties jointly propose a modest amendment of the Court's Scheduling Order (ECF No. 438), subject, of course, to the Court's concurrence:<sup>5</sup>

<b><u>Current Deadline</u></b>	<b><u>Subject</u></b>	<b><u>Proposed Deadline</u></b>
July 16, 2025	Fact Discovery	August 29, 2025
July 16, 2025	Rule 56 Motion Concerning Synergy Marine	August 29, 2025
August 29, 2025	Claimants' Rule 26(a)(2) Disclosures	October 13, 2025
October 31, 2025	Petitioners' Rule 26(a)(2) Disclosures	December 12, 2025
November 21, 2025	Claimants' Rebuttal Rule 26(a)(2) Disclosures	January 16, 2026
February 27, 2026	Expert Discovery; Supplementation of Disclosures	March 27, 2026
February 27, 2026	Submission of Joint Status Report	March 27, 2026
March 9, 2026	Requests for Admission	April 3, 2026

<sup>5</sup> The Parties will file a Joint Motion to Continue Certain Deadlines. The Parties acknowledge that the depositions of several witnesses are currently anticipated to be taken after the proposed August 29, 2025 close of fact discovery. The Parties are working together to resolve this issue and are hopeful they will be able to reach agreement for these depositions to be taken sooner, if at all.

The Parties propose that all other deadlines remain as set forth in ECF No. 438.

**Remaining Issue of Dispute – Not for Immediate Resolution**

In view of Petitioners' refusal to produce the witnesses listed above for deposition in Baltimore, Claimants object to any later attempt by Petitioners to bring the individuals to the United States to provide testimony, such as at the trial of this matter. Petitioners dispute the characterization of their inability to require these witnesses to travel to the United States at this time and disagree with any restrictions on their future ability to produce the witnesses for testimony in the United States and expressly reserve their right to do so.

This issue is not ripe for resolution at this time but is being presented here solely to flag the issue for the Court.

Respectfully submitted this 23rd day of April 2025.

ANTHONY G. BROWN  
Attorney General of Maryland

Robert A. Scott (24613)  
Howard R. Feldman (05991)  
Assistant Attorneys General  
Office of the Attorney General  
200 Saint Paul Place, 20<sup>th</sup> Floor  
Baltimore, Maryland 21202  
[rscott@oag.state.md.us](mailto:rscott@oag.state.md.us)  
T: (410)576-63214

and

Margaret Fonshell Ward (04586)  
DOWNS WARD BENDER HERZOG  
& KINTIGH, P.A.  
1350 McCormick Road  
Executive Plaza 3, Suite 400  
Hunt Valley, Maryland 21031  
[mward@downs-ward.com](mailto:mward@downs-ward.com)  
(410) 584-2800

/s/ David L. Reisman

R. Keith Jarrett, T.A. \*  
David L. Reisman, T.A. (La. Bar # 21833)\*  
Raymond T. Waid\*  
Elizabeth B. McIntosh\*  
Jessie E. Shifalo\*  
Elizabeth A. Strunk\*  
LISKOW & LEWIS  
701 Poydras Street, Suite 5000  
New Orleans, Louisiana 70139-5099  
T: (504) 581-7979  
[dreisman@liskow.com](mailto:dreisman@liskow.com)  
[rkjarrett@liskow.com](mailto:rkjarrett@liskow.com)  
[rwaid@liskow.com](mailto:rwaid@liskow.com)  
[ebmcintosh@liskow.com](mailto:ebmcintosh@liskow.com)  
[jshifalo@liskow.com](mailto:jshifalo@liskow.com)  
[eastrunk@liskow.com](mailto:eastrunk@liskow.com)

Scott S. Partridge\*  
PARTRIDGE LLC

231 Glendale Drive  
Metairie, Louisiana 70001  
scott@partridgellc.com  
(314) 952-4132

William J. Jackson\*  
Ivan Morales\*  
Maria F. Pimienta\*  
KELLEY DRYE & WARREN LLP  
515 Post Oak Blvd, Suite 900  
Houston, Texas 77027  
bjackson@kelleydrye.com  
imorales@kelleydrye.com  
mpimienta@kelleydrye.com  
(713) 355-5000

Melissa E. Byroade (31335)  
KELLEY DRYE & WARREN LLP  
Washington Harbour  
3050 K Street NW, Suite 400  
Washington, D.C. 20007  
mbyroade@kelleydrye.com  
T: (202) 342-8823

Philip D. Robben\*  
Julia Schuurman\*  
KELLEY DRYE & WARREN LLP  
3 World Trade Center  
175 Greenwich Street  
New York, New York 10007  
probben@kelleydrye.com  
jschuurman@kelleydrye.com  
T: (212) 808-7800

Andrew W. Homer\*  
KELLEY DRYE & WARREN LLP  
888 Prospect Street, Suite 200  
La Jolla, California 92037  
ahomer@kelleydrye.com  
T: (858) 795-0426

Mark Lanier\*  
The Lanier Law Firm  
10940 W. Sam Houston Pkwy N  
Suite 100  
Houston, TX 77064

mark.lanier@lanierlawfirm.com  
T: (713) 659-5200

*\*Admitted Pro hac vice  
Attorneys for State of Maryland*

s/ Robert B. Hopkins  
Robert B. Hopkins (Bar No. 06017)  
Laurie G. Furshman (Bar No. 29604)  
Tristan A. Dietrick  
DUANE MORRIS LLP  
1201 Wills Street, Suite 330  
Baltimore, MD 21231  
T: (410) 949-2900  
[RBHopkins@duanemorris.com](mailto:RBHopkins@duanemorris.com)  
[LGFurshman@duanemorris.com](mailto:LGFurshman@duanemorris.com)  
[tdietrick@duanemorris.com](mailto:tdietrick@duanemorris.com)

William R. Bennett III\*  
Thomas H. Belknap, Jr.\*  
Alan Weigel\*  
Neil P. McMillan\*  
Noe S. Hamra\*  
BLANK ROME LLP  
1271 Avenue of the Americas  
New York, NY 10020  
T: (212) 885-5000  
[William.Bennett@blankrome.com](mailto:William.Bennett@blankrome.com)  
[Thomas.Belknap@blankrome.com](mailto:Thomas.Belknap@blankrome.com)  
[Alan.Weigel@BlankRome.com](mailto:Alan.Weigel@BlankRome.com)  
[Neil.McMillan@BlankRome.com](mailto:Neil.McMillan@BlankRome.com)  
[noe.hamra@blankrome.com](mailto:noe.hamra@blankrome.com)

Kierstan L. Carlson\*  
Emma C. Jones\*  
BLANK ROME LLP  
1825 Eye St. NW  
Washington, DC 20006  
T: (202) 420-2200  
[Kierstan.Carlson@blankrome.com](mailto:Kierstan.Carlson@blankrome.com)  
[Emma.Jones@BlankRome.com](mailto:Emma.Jones@BlankRome.com)

*\*Admitted Pro Hac Vice*



*Counsel for Petitioners, Grace Ocean Private Limited  
and Synergy Marine Pte Ltd.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 23rd day of April 2025, a copy of the foregoing Joint Status Report was served via the court's CM/ECF system on all counsel of record.

/s/ David L. Reisman  
David L. Reisman (La. Bar # 21833)